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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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ABDULLAH GLOVER,	:
	:
Plaintiff,	:
	:
- against -	:
	:
VERIZON NEW YORK INC.,	:
	:
Defendant.	:
	:
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**INTRODUCTION**

1. This is an action brought under Title VII of the Civil Rights Act of 1964, 42 U.S.C. §1981, and the New York State Human Rights Law for race discrimination and racial harassment on behalf of Abdullah Glover, a former employee of Verizon New York Inc. (“Verizon”).

2. Mr. Glover, an African American man, was hired as a lineman in October 2018 and assigned to a Verizon garage in Bohemia, New York where race discrimination and harassment was rampant. In the unit, Mr. Glover was severely harassed based on his race, including an occasion where he was referred to as a monkey or ape.

3. Mr. Glover was eventually terminated for failing to pass the Commercial Driver's License Exam ("CDL") exam. However, white employees were permitted to take the exam under more favorable circumstances.

### **THE PARTIES**

4. Plaintiff Abdullah Glover is an African American man who lives in Brooklyn, New York.

5. Defendant Verizon New York Inc. is a corporation organized under the laws of New York with its principal place of business in New York, New York.

### **JURISDICTION AND VENUE**

6. This Court has jurisdiction over Mr. Glover's Title VII claim pursuant to 28 U.S.C. § 1343 and § 1331. Mr. Glover filed a complaint with the Equal Employment Opportunity Commission ("EEOC") on or about April 22, 2020. The EEOC issued a right to sue letter, attached hereto as Exhibit A, on November 16, 2020.

7. Venue is properly before this Court pursuant to 28 U.S.C. § 1391 as Plaintiff was employed in this District and therefore substantial part of the events or omissions giving rise to the claim occurred in this District.

### **STATEMENT OF FACTS**

8. Mr. Glover was hired by Verizon as a lineman in February 2018.

9. After training in Virginia, Mr. Glover was assigned to the Verizon garage in Bohemia, New York in Suffolk County.

10. Out of the approximate 25 linemen assigned to the Bohemia garage, there was only one other dark-skinned individual. Mr. Glover was told prior to his assignment there that it was known as a hostile workplace for African Americans and other dark-skinned individuals.

11. Once there, Mr. Glover was subjected to regular racial harassment. Glover was regularly questioned in an offensive way about his skin color, including being asked by his co-worker, Frank Quadrino, whether his dark skin repels the sun. Quadrino also offensively referred to other African Americans as “colored” and told Mr. Glover during an argument to “climb,” which Mr. Glover interpreted as a monkey reference. Another co-worker, Nicky, called Mr. Glover “nigger.”

12. Mr. Glover was also treated differently than white employees. While the white employees in the garage were allowed to use the bucket or a ladder to work on elevated wires, Mr. Glover was consistently instructed to climb the telephone pole, which is considerably more difficult.

13. Mr. Glover complained about the racial harassment to his supervisor Jeffrey H.

14. On July 15, 2019, Mr. Glover was terminated in a discriminatory fashion. The basis of the termination was that Mr. Glover had failed the CDL exam for the third time. However, it was known that Verizon employees had difficulty passing the CDL exam at New York Department of Motor Vehicles and Verizon arranged for white employees to take the CDL test in Pennsylvania where it was easier to pass. Mr. Glover was not, however, given that opportunity.

**FIRST CLAIM FOR RELIEF**  
(Racial Harassment in Violation of Title VII)

15. Plaintiff repeats and re-alleges the allegations contained in the preceding paragraphs above as if fully set forth herein.

16. Defendant discriminated against and harassed Plaintiff in the terms and conditions of his employment, based on his race, in violation of Title VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000e.

**SECOND CLAIM FOR RELIEF**  
(Racial Harassment in Violation of 42 U.S.C. §1981)

17. Plaintiff repeats and re-alleges the allegations contained in the preceding paragraphs above as if fully set forth herein.

18. Defendant discriminated against, and harassed Plaintiff in the terms and conditions of his employment based on his race in violation of 42 U.S.C. §1981.

**THIRD CLAIM FOR RELIEF**  
(Racial Harassment in Violation of NYSHRL)

19. Plaintiff repeats and re-alleges the allegations contained in the preceding paragraphs above as if fully set forth herein.

20. Defendant discriminated against, and harassed Plaintiff in the terms and conditions of his employment based on his race in violation of the NYSHRL

**FOURTH CLAIM FOR RELIEF**  
(Race Discrimination in Violation of Title VII)

21. Plaintiff repeats and re-alleges the allegations contained in the preceding paragraphs above as if fully set forth herein.

22. Defendant discriminated against and discharged Plaintiff from his employment based on his race in violation of Title VII.

**FIFTH CLAIM FOR RELIEF**  
(Race Discrimination in Violation of 42 U.S.C. §1981)

23. Plaintiff repeats and re-alleges the allegations contained in the preceding paragraphs above as if fully set forth herein.

24. Defendant discriminated against and discharged Plaintiff from his employment based on his race in violation of 42 U.S.C. §1981.

**SIXTH CLAIM FOR RELIEF**  
(Race Discrimination in Violation of the NYSHRL)

25. Plaintiff repeats and re-alleges the allegations contained in the preceding paragraphs above as if fully set forth herein.

26. Defendant discriminated against and discharged Plaintiff from his employment based on his race in violation of the NYSHRL.

WHEREFORE, Plaintiff demands judgment:

1. Reinstating Plaintiff's employment and upon reinstatement, enjoining Defendant from harassing Plaintiff on the basis of his race, in the terms and conditions of his employment;
2. Awarding Plaintiff back pay;
3. Awarding Plaintiff compensatory damages, including but not limited to damages for emotional distress;
4. Awarding Plaintiff punitive damages;
5. Awarding reasonable attorneys' fees, costs, and expenses, and

Granting such other legal and equitable relief to the Plaintiff as the Court may deem just and equitable.

**JURY DEMAND**

Plaintiff demands trial by jury of all issues as of right by a jury.

Dated: New York, New York  
February 11, 2021

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